IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IN RE MBNA CORPORATION

DERIVATIVE AND CLASS

LITIGATION

This Document Relates To:

ALL ACTIONS.

ALL ACTIONS.

PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMITATION

Plaintiffs, by and through their undersigned counsel, hereby move for leave to exceed the 40 page limitation in Local Rule 7.13. Plaintiffs respectfully request leave to serve and file an answering brief not in excess of seventy-five pages. Plaintiffs request the additional pages in order to file a consolidated answering brief to the Motion to Dismiss filed by Bank of America Corp. et al. (D. I. 38) and the Motion to Dismiss filed by James H. Berick et al. (D. I. 42), rather than filing individual answering briefs for both Motions to Dismiss. Plaintiffs believe that filing a consolidated answering brief will avoid the unnecessary repetition of argument and serve the interests of judicial economy. Defendants do not oppose the instant motion.

Dated: February 15, 2006 CHIMICLES & TIKELLIS LLP

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